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January 27, 2022

Via ECF

Hon. Paul W. Grimm
United States District Court
District of Maryland
6500 Cherrywood Lane, Suite 465A
Greenbelt, Maryland 20770

Re: *Estate of Ke Zhengguang v. Stephany Yu*, Case No. 8:18-cv-03546-PWG
Estate of Ke Zhengguang v. Stephany Yu, Case No. 8:20-cv-02260-PWG

Dear Judge Grimm,

We write on behalf of Petitioner Estate of Ke Zhengguang in response to the January 20, 2022 letter to Your Honor from counsel to Respondent Stephany Yu (ECF No. 82). This is Respondent's *fifth* letter to this Court concerning the Hong Kong proceedings. As with its previous four letters (*see* ECF Nos. 74, 76, 78, and 80), Respondent cites no authority for this Court to do anything in response to the Hong Kong court proceedings.

In February 2020, this Court held that all of the Orders issued in the underlying Hong Kong arbitration should be enforced. (ECF No. 53.) In November 2020, all parties to this action submitted proposed final judgments to this Court which addressed (among other issues) post-award interest. (*See* ECF No. 70-2, Ex. 1; ECF No. 71-1, Ex. A.)

Respondent's latest letter claims that it is "not asking the Court to resolve any questions before the Hong Kong court" and only seeks to "reiterate" its position on post-award interest. (ECF No. 82 at 3.) Yet, Respondent's five letters on the Hong Kong case plainly invite this Court to examine the ever-evolving record of that case—and attach numerous filings from that case—notwithstanding that the parties to this case have already submitted proposed final judgments on all remaining issues, including post-award interest. Respondent once again cites no legal basis for this Court to examine the record in the Hong Kong case before issuing a final judgment here. Respondent's mere desire to "reiterate" its position on

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post-award interest is not a basis for an open-ended fishing expedition into the Hong Kong case.¹

The Court should proceed to issue a consolidated final judgment in accordance with the procedure that was agreed by the parties and approved by this Court. (See ECF No. 69.)

Respectfully submitted,

/s/ Joseph M. Creed

Joseph M. Creed (Bar No. 17134)

/s/ Amiad M. Kushner

Amiad M. Kushner (admitted *pro hac vice*)

cc: All Counsel of Record (via ECF)

¹ Respondent's contentions concerning the Hong Kong proceedings, and Petitioner's intentions, are inaccurate. Further, Respondent's submissions in the Hong Kong case (and Respondent's ongoing barrage of unauthorized correspondence to this Court concerning the Hong Kong case) are an abuse of judicial process. However, rather than burdening this Court with duplicative and unwarranted briefing concerning the Hong Kong case, Petitioner intends to respond to Respondent's contentions in the Hong Kong case as and when necessary.